



PELTON GRAHAM LLC
ADVOCATES FOR JUSTICE

MEMO ENDORSED

October 21, 2022

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VIA CM/ECF

Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square, Room 619
New York, New York 10007

Re: *Ballast, et al. v. Workforce7 Inc., et al.*
Civil Action No.: 20-CV-03812 (ER)

The Plaintiffs' request to file a motion to amend by November 7, 2022 is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: October 22, 2022

New York, New York

Dear Judge Ramos:

This office represents the plaintiffs in the above-referenced action. We write, on the consent of all Defendants, to request an extension of Plaintiffs' deadline to file their proposed amended complaint or a motion to amend, which is currently set for October 25, 2022. (Dkt. No. 261).

In the parties' September 9, 2022 letter request for an extension of pending discovery deadlines, Plaintiffs informed the Court that they desire to amend their complaint to add certain additional named plaintiffs to replace former named plaintiff Marquis Richardson, whose claims were dismissed with prejudice on May 4, 2022. (Dkt. Nos. 246, 258). Plaintiffs exchanged their draft second amended complaint with Defendants on October 18, 2022. Counsel for Defendants expect to hear back from their respective clients next week at the earliest regarding any comments to Plaintiffs' draft and whether they will consent to the filing. As such, to allow Defendants sufficient time to review Plaintiffs' draft and potentially conduct further discussions with Plaintiffs' counsel, Plaintiffs request a two (2)-week extension, until November 7, 2022, to file their proposed amended complaint or a motion to amend.

This is Plaintiffs' second request for an extension of the deadline to file their proposed amended complaint, and it is made on the consent of all parties. Plaintiffs' first request, which was filed on October 7, 2022, was granted on October 11, 2022. (Dkt. Nos. 260-61).

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Brent E. Pelton

Brent E. Pelton, Esq. of
PELTON GRAHAM LLC

Hon. Edgardo Ramos

Parties' Request for Extension of the Deadline to File Second Amended Complaint

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Enclosure

cc: All Counsel (via CM/ECF)